

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
PAUL R. CASTNER,	:	
	:	CASE NO. 18-21827
DEBTOR,	:	
	:	CHAPTER 13
PAUL R. CASTNER,	:	
	:	DOCUMENT NO. 106
MOVANT,	:	RELATED TO DOC. NO. 102
	:	
VS.	:	
	:	
CAPITAL ONE; CITIBANK/THE HOME	:	
DEPOT; COMENITY BANK/VICTORIA	:	
SECRET; COMENITY CAPITAL/MPRC	:	
CREDIT COLLECTIONS SERVICES;	:	
DITECH; FIFTH THIRD BANK; FIRST	:	
NATIONAL BANK; KAY JEWELERS;	:	
KEYBANK, N.A.; KOHL'S/CAPITAL	:	
ONE; SYNCHRONY BANK/OLD NAVY;	:	
SYNCHRONY BANK/CARE CREDIT;	:	
SYNCHRONY BANK/LOWE'S;	:	
SYNCHRONY BANK/MENS WARE-	:	
HOUSE, RONDA J. WINNECOUR,	:	
CHAPTER 13 TRUSTEE; U.S. TRUSTEE	:	
	:	
RESPONDENTS.	:	

NOTICE OF PROPOSAL TO CURE PLAN DEFAULTS

1. Debtor proposes to cure the plan default as pleaded in the Trustee's Certificate of Default.
2. The cure shall be effected as follows: The sum of \$15,000.00 from guaranteed funds of Debtor's employer in the amount of \$15,000.00. Debtor anticipates receiving said funds in approximately 45 days from the date hereof, and at such time as Debtor receives the funds, the entire amount of \$15,000.00 will be paid to the Plan.
3. All objections to the proposed cure must be filed and served by no later than 21 days after the date of this Notice upon the Debtor and Chapter 13 Trustee. Untimely

objections will not be considered. Any creditor who files a timely Objection to cure must appear at the scheduled Conciliation Conference on the proposed cure.

4. A virtual (via Zoom) Conciliation Conference on the proposed cure will be held on March 2, 2023, at 10:00 A.M. before the Chapter 13 Trustee. The table and meeting I.D. to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <http://www.ch13pitt.com/calendar> several days before the meeting. Parties are expected to familiarize themselves with the trustee's website at <http://www.ch13pitt.com/> and to comply with the procedures set forth at that site for conference participation.

RESPECTFULLY SUBMITTED, this 30th day of January, 2023.

/s/ Louis Pomerico, Esquire

Louis Pomerico, Esquire

PA. I.D. NO. 22855

Attorney for Debtor

2910 Wilmington Road

New Castle, PA 16105

(724) 658-7759

info@pomericolaw.com